

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE: \* CASE NO. 10-11522 BKT  
\*  
SONIA M. ACEVEDO MARRERO \* CHAPTER 11  
Debtor \*  
\*  
\*\*\*\*\*

**URGENT MOTION FOR PROTECTIVE ORDER**

TO THE HONORABLE COURT:

Comes now, DEBTOR SONIA M. ACEVEDO MARRERO, through the undersigned attorney who respectfully states and prays as follows:

1. The Movants today have filed at docket #38 an "Expedited Motion to Shorten Time For Discovery". In this motion at paragraph 3.c they "Request for admissions to authenticate those exhibits to the motions..." all in the Spanish language. Not one of these documents has been translated.

2. As the docket reflects the debtor has objected the use of all and any documentation that has been filed at dockets number 8, 9 and 17. The objection is sustained on Local Bankruptcy Rule 9070-1(c).

3. The Movants petitioned the Court to allow them to file the translated certified documents on the date of the hearing scheduled for January 11, 2011. The Court granted the Movants request. Debtor objected this request, but the Court held that the motion was moot.

4. The debtor has argued that pursuant to our Local Bankruptcy and District Court Rules until the documents they propose to use are translated into English by a court certified translator these documents are inadmissible in evidence, precisely quoting the rules.

5. Debtor having argued the aforesated, the Movants filed a Motion titled "Expedited Motion to Shorten Time For Discovery" requesting shortening of time for the delivery of discovery which includes a request for admissions. We include a copy of the

document. The Court can verify that the Movants are trying to have admitted documentation that is drafted in Spanish, has not been translated pursuant to the Bankruptcy Rules, and therefore are inadmissible as evidence. The local rules for the United States District Court for the District of Puerto Rico Rule 5(e), also require the certified translation into English.

6. The debtor requests from this Honorable Court that the Request for Admissions made by the Movants be denied due to the lack of compliance with the local rules.

7. That once the Movants produce the certified translated documents, the debtor be given time in order to review and determine on whether to admit or not admit those documents.

8. The debtor renews its objection to the filing of documents in Spanish and the intent to use them in the hearing scheduled for January 11, 2011.

9. The debtor also renews its objection to the Order of the Court allowing the filing of the translated documents on the very day of the hearing.

THEREFORE, it is respectfully requested from this Honorable Court:

(1) That the Request for Admissions of Documents that the Movants have served on the debtor be denied

(2) That the Court issue a protective order denying the request for admissions of all documents in the Spanish language. Documents that have not been translated filed with the Court and copy served to the debtor.

(3) That the Court deny the presentation of any translated documents on the date of the hearing.

(4) That the Motion to Dismiss and Motion for Lifting of Stay be denied.

#### CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to the following

the Offices of the US Trustee, Monsita Lecaroz Arribas – [ustpregion21.hr.ecf@usdoj.gov](mailto:ustpregion21.hr.ecf@usdoj.gov) and Edgardo Muñoz - [emunoz@emunoz.net](mailto:emunoz@emunoz.net).

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 3rd day of January, 2011.

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